

Comment from Special Counsel Jeff Lubbers on Public Availability of Settlement Agreements in
Agency Enforcement Proceedings
December 9, 2022

1. In footnote 1, you don't need the hyphen in line two between "federal" and "court."
2. In footnote 4 in the title of Recommendation 86-8, the word "Neutrals" should be set off with double quotation marks, not single ones. I checked the actual title.
3. On line 36, I would substitute "numbers" for "volumes"
4. In footnote 9, there is a glitch: the label "Admin. Conf. of the U.S." is missing in the citation of Recommendation 2020-5. It seems to have drifted into duplicating itself in front of Recommendation 2018-5.
5. In line 54, I would add "and after" after the word "before".